

Sealed

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

United States Courts
Southern District of Texas
FILED

FEB 21 2024

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

v.

FLORENCIO "LENCHO" RENDON,

Defendant.

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**Criminal No. 4:24-cr-00089
UNDER SEAL**

MOTION TO SEAL

TO THE HONORABLE COURT,

COMES NOW the United States of America, by and through Marco Palmieri, Rosaleen O'Gara, and Celia Choy, Attorneys for the United States Department of Justice, Public Integrity Section, Criminal Division, and Garrett Coyle, Attorney for the United States Department of Justice, National Security Division, and respectfully makes the following requests:


The United States respectfully requests that the Court seal the Information, the Motion to Seal, the accompanying order, the Notice of Related Cases, the courtroom during the related proceedings, and any transcripts produced therefrom, including the Arraignment, Initial Appearance, and Plea Hearing, and the docket. The United States requests that these documents, the docket, and the transcript from those hearings be sealed to protect Defendant Florencio "Lencho" Rendon, who plans to cooperate further in related matters, and to prevent alerting subjects, targets, and witnesses associated with those matters from fleeing, destroying evidence, or avoiding entry into the United States or a jurisdiction from which they can be extradited. Maintaining these documents, the docket, and those transcripts under seal until the resolution of related matters, will ensure that Defendant may carry on his cooperation without detection and without endangering himself, and that the matters under investigation are not imperiled.

The United States has conferred with counsel for Defendant Rendon who is in agreement with this Motion to Seal.

Therefore, the United States respectfully requests that this Court seal the Information, this Motion, the accompanying Order, the Notice of Related Cases, the underlying docket, the courtroom, and the transcripts of any associated hearings, and that no person shall have access to these documents, the docket, or those transcripts, except the clerk of the Court or the Clerk's designated deputies, attorneys for the United States and Defendant, authorized representatives and agents of agencies involved in the investigation, and those otherwise acting pursuant to the Court's orders.

Respectfully submitted,

COREY R. AMUNDSON
Chief, Public Integrity Section
Criminal Division
US Department of Justice

By: 
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By:  ^{by} A.P.
Garrett Coyle
Trial Attorney